



August 22, 2018

VIA E-MAIL – Mia.Marcia@epa.gov

Ms. Marcia B. Mia
Air Branch
Office of Compliance
2227A WJCS
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Claim of Confidential Proprietary Business Information/Trade Secrets
Request for Reconsideration of Applicability Determination
Aemerge RedPak Services Southern California, LLC
Hesperia, CA

Dear Ms. Mia:

Thank you for your July 31, 2018 e-mail providing EPA's follow-up questions to our June 19, 2018 meeting. Accompanying this letter are responses by Aemerge RedPak Services Southern California, LLC (RedPak) to EPA's Question Nos. 1, 2, 3, 4, 5, 7, 8, 9, and 12 regarding our large and mid-sized Carbonizer/Gasifier System and EPA's Question No. 1 regarding our small Carbonizer/Gasifier System (referred to as "Small Py Unit").

These responses have been marked "CONFIDENTIAL TRADE SECRETS" and "COMPANY CONFIDENTIAL PROPRIETARY BUSINESS INFORMATION" and are submitted under a business confidentiality claim and requested to be treated as confidential proprietary business information and/or as confidential trade secret information pursuant to 40 Code of Federal Regulations Part 2, Subpart B. The information provided in the attached responses to EPA's questions contains proprietary information and trade secrets, including detailed design and operational information that has not and cannot be obtained by other persons without RedPak's consent and is subject to company measures to protect its confidentiality. Disclosure of this information would cause substantial harm to RedPak's competitive position and would impair the government's ability to obtain necessary information in the future.

Responses to the remaining questions will be provided separately.

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Please contact me if you need any additional information. Thank you.

Sincerely,

Aemerge RedPak Services Southern
California, LLC

A handwritten signature in black ink, appearing to read "L. G. Miller".

Landon C. G. Miller
COO

Enclosure: CONTAINS CONFIDENTIAL PROPRIETARY INFORMATION
 AND TRADE SECRETS

cc: Adam Seger, CEO
 Andy Bowman, Bingham Greenebaum Doll LLP